

**LOCAL BANKRUPTCY FORM 9019-1**

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA**

**IN RE:**

KEIRI YENNISEL CONCEPCION,

**CHAPTER** 13

**CASE NO.** 5 - 21 -bk- 02432

**Debtor(s)**

NISSAN MOTOR ACCEPTANCE  
CORPORATION, AS SERVICING AGENT FOR  
INFINITI FINANCIAL SERVICES,

**ADVERSARY NO.**     -     -ap      
(if applicable)

**Plaintiff(s)/Movant(s)**

**vs.**

KEIRI YENNISEL CONCEPCION,  
RICHARD D. SANTANA and,

**Nature of Proceeding:** Motion for

**Pleading:** Relief from Automatic Stay

**Defendant(s)/Respondent(s)**

**Document #:** 50, 51

**REQUEST TO REMOVE FROM THE HEARING/TRIAL LIST\***

**CHECK ONE:**

☐ The undersigned hereby withdraws the above identified pleading with the consent of the opposition, if any.

☒ The undersigned counsel certifies as follows:

(1) A settlement has been reached which will be reduced to writing, executed and filed within (please check only one).

- ☒ Thirty (30) days.  
☐ Forty-five (45) days.  
☐ Sixty (60) days.

(2) If a stipulation is not filed or a hearing requested within the above-stated time frame, the Court may dismiss the matter without further notice.

(3) Contemporaneous with the filing of this request, the undersigned has served a copy of this request upon all counsel participating in this proceeding.

Dated: January 11, 2023

/s/ Keri P. Ebeck

Attorney for Nissan Motor Acceptance Corporation

\*No alterations or interlineations of this document are permitted. This request must be filed twenty-four (24) hours prior to the hearing.